

SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



SIGN-UP NOW FOR OSHA 30-HOUR CONSTRUCTION COURSE

High Safety is presenting an OSHA 30-Hour class at the Associated Builders and Contractors (ABC) facility. This program starts at 7:30 AM and runs to 4:30 PM on 2-28-07, 3-1-07, 3-6-07 and 3-7-07. This program is ideal for anyone that wants to understand construction safety requirements. It is ideal for supervisors, foremen, project managers, company management, safety coordinators and safety committee members. Some general contractors and specific projects are requiring at least one site person to be trained with the OSHA 30 hour class. This program will cover: How to handle OSHA inspections, the OSHA Act, Confined Space, Electrical Safety, Fall Protection Requirements, Steel Erection, Concrete, Demolition, Hazardous Chemicals, Respiratory Protection, Personal Protective Equipment, Trenching & Excavation Requirements, Safety Management Programs, First Aid Requirements, Stairs & Ladders, Tools and Guarding Requirements, Ergonomics, Welding, Fire Suppression and Control, Cranes and Rigging, Traffic Control Aspects and a host of other topics. If you are an ABC member you get a great discount! Register at www.abckeystone.org ...Click into the calendar for more details. If you are not a member, register through our website for special pricing.

2007 SCHEDULE IS AVAILABLE

Our 2007 course schedule is complete. The course catalog is posted on our website as a .pdf file. You will be able to register on-line soon for the scheduled programs. Until we have these set up for registration, phone registrations are accepted. Course catalogs will be mailed out in the next few weeks as well. If you live or work near our offices, checkout our new safety series called Monday Morning Message. These sessions will be held on the third Monday of every month from 8AM to 9AM. We promise to get you in and out quickly and back to work. We know you have a lot to do! The purpose of these sessions is to give you a chance to get your coffee and donut, but also get caught up on any new OSHA issues as well as cover a specific compliance / safety topic. We scan the OSHA website, trade publications and related information sources each month. We will present the most important trends and concerns to the group in a brief 15-20 minute update. This will be followed by a 35 minute review of specific topics that have been defined for the year. The cost is only \$45 per session and MUCH less if you sign-up for blocks of these sessions. This is also a good way to keep a safety committee or supervisory group up-to-date on issues. It could also be an update meeting prior to your company's safety committee. Here's an idea...If you want to hold a safety committee meeting at our facility following this session, we can make a room available for you as well. Other programs being offered in the near future include the OSHA 10-Hr Construction (3-27-07 & 3-29-07); and OSHA Recordkeeping (4-12-07). Remember that we can also do on-site training at your location.

THERE IS A DIFFERENCE

If you are contracting industrial hygiene / air sampling work it is important that you obtain valid and useful data or the basis of your whole protection program will be amiss. I believe that some of our potential customer base is sometimes not well-educated on what to look for in an industrial hygiene consultant and as such seeks out the lowest priced proposal. We are not the lowest cost provider and we don't want to be. If you want to base your chemical safety program on the lowest possible price, then I can provide some contacts for you that will provide this

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level of service. I would never want to rely on information generated by some of the surveys I've seen to protect my co-workers.

It may sound like I am just trying to tout our services...but really – please consider my message. Sure I want your business...but even more...I want to assure that whomever you select that you are getting what you (and your employees) need.

Often I see exposure assessment reports which specify “The exposure to chemical xyz is 100 ppm. This is above the TLV of 10 ppm. The company should implement a respiratory protection program in compliance with 29 CFR 1910.134 and select respirators with a protection factor greater than 10.” If this is what you are getting from your service provider, you deserve much more! Here are a few pointers that you might want to consider to assure that the service you are getting is what you should be getting:

1) Ask for neutered sample reports from prior surveys done by the firm. Here's a hint – If the report is three pages long (I've seen some that are 1 page!) there is no way you are getting the amount of information you need for a valid survey. (Most of our survey reports are ten to thirty pages.)

2) The report should include detailed information on the pre and post calibrations of the pumps, the methods used for collection and analysis, the individuals sampled, the activities performed during the shift, the specific hours monitored, the assessment of the ventilation systems in place, the protective equipment being used by the workers, the details of how the materials are used and potential interference sources based on the methods used, the lab used -- including their accreditation number FOR THE ANALYSIS performed. I discussed the importance of lab accreditation in a newsletter last year. (Just because a lab does an analysis, doesn't mean they are accredited to do it.).

3) Does the firm have a Certified Industrial Hygienist (CIH) on staff to review the work? Will the person be involved in the sampling process or at very least oversight of the project? Do the individuals conducting the sampling have experience in doing so and are they able to properly assess and collect the information required in item #2?

4) Are you monitoring for the RIGHT hazards? Many people I run into believe that if they have an “air test” done it will assure the air is safe. Nothing could be further from the truth -- If you are sampling for the wrong hazards. For example, ACGIH has changed their approach from total dust samples for wood dusts to inhalable dusts fractions. This means that companies that deal with wood dust exposures should now be having air monitoring done based on inhalable wood dust levels. THIS IS DIFFERENT THAN RESPIRABLE DUST and it is different than TOTAL DUST. (We have inhalable dust samplers for just this reason). We have seen that air monitoring for total dust may show acceptable results, but the inhalable dust fraction exceeds the limits, posing an exposure risk. So having one without the other provides an incomplete picture. Another good example is welding fume. A total welding fume assessment will not properly assess the individual component metals which are more likely to be the cause of an exposure illness long-term. How are you determining WHAT to sample for? – This is where assistance from a qualified resource will make the difference.

4) Are recommendations well developed? A recommendation to wear a respirator or hearing protection (for noise surveys) is often flawed. These are the last lines of defense. If these need to be recommended, it means that the report writer could not determine any other better method to control the exposure. Sometimes this is the case, but often it is simply an underdeveloped report effort.

Selection of test methods, sampling strategies and report development all will impact the value of an industrial hygiene test as well as the cost. A simple total dust sample may have a lab cost of \$20 per sample...while doing more specific contaminant testing may run \$100 a sample depending on the substance. The first will provide some information but often will be incomplete. I saw this in a project we did wherein a company was attempting to mount a defense based on very sloppy hygiene reports that equated to a piece of paper providing exposure levels and nothing more. The report was worthless for any type of legal defense. I think my high school daughter could have recognized that! My point is...Be an educated consumer of IH services and get what you pay for!

There about 5000 traumatic work injuries each year. There are an estimated 50,000 occupational-related exposure deaths. Are you addressing both hazards? (PS: We can help with Industrial Hygiene sampling programs and chemical exposure review assessments.)

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OSHA PROMOTES AEDs - AGAIN

I copied a section from OSHA's most recent update where they are again promoting the importance of AED's in the workplace. We placed 17 AED's this month and taught 8 CPR / First Aid Classes! Again, I encourage you, if you don't have an AED in your workplace...It can make the difference between life and death. The cost of these units fully equipped in less than \$2000. February is heart month. Protect yours and your co-workers!

'QuickTips' from QuickTakes:

Employees involved in shift work, holding high stress jobs, or exposed to certain chemicals or electrical hazards may face a higher risk of heart disease and cardiac arrest. Automated external defibrillators (AEDs) are medical devices designed to analyze the heart rhythm and deliver an electric shock to victims of ventricular fibrillation to restore the heart rhythm to normal. Because the use of AEDs can save the lives of employees who experience cardiac arrest while on the job, OSHA is encouraging employers to consider making this equipment available in their workplaces. Here are some of the reasons for having AEDs in the workplace.

- >Onsite AEDs save precious treatment time, and can improve survival odds because they can be used before emergency medical service personnel arrive.
- >A heart rhythm in ventricular fibrillation may only be restored to normal by an electric shock.
- >AEDs are compact, lightweight, portable and battery-operated.
- >The devices are safe and easy to use by those who have been properly trained.

We can demonstrate various models. If you are interested, call our AED guru – Barb Rutt.

QUICK ANSWERS

Do I need a written evacuation plan?

Maybe. If you have ten or more employees 29 CFR 1910.38 requires that you have a written emergency action plan. This plan must be communicated to all employees. The plan needs to address other potential likely emergencies besides providing an evacuation process. If you have less than ten employees, you still need a plan, it just doesn't have to be in writing.

Do I need a written security plan?

Maybe. If you ship or cause to be shipped a placarded load of hazardous materials (typically more than 1001 lbs.) you must have a written security plan under 49 CFR 172. All employees must be trained on this plan. If you ship hazmats you must have HM172 H training every 3 years and within 90 days for new employees (if they work under the supervision of other employees).

We use flammable liquids. How many containers can we have in the work area?

This depends on the function of your business, but for most facilities a maximum of 25 gallons of Class I flammable liquids are permitted to be outside of a fire cabinet and available for immediate use. In addition, this should not exceed one shift's needs. All other class I liquids must be in a fire cabinet with a maximum of 60 gallons permitted per cabinet.

Do I need to ventilate the cabinet?

No. There are provisions for ventilation of cabinets and this can be done, but it is extremely important that the proper type of fan and motor is used to avoid this ignition of the flammable vapors that are being exhausted. The need to ventilate a cabinet would be determined by the product, uses and risks. In most cases, cabinets don't need to be ventilated.

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OTHER UPCOMING THINGS

I will be presenting at the Lancaster Chamber of Commerce Workers' Compensation Update on OSHA compliance issues for 2007. The program is held at the Chamber from 7:30 AM to 9:00 AM on February 27th. On May 24th, I will present for the Pennsylvania Chamber's OSHA & Workplace Safety Conference on Critical aspects to a Safety Program: How to Stop the Stupid Accidents! This looks like a good program agenda, so you will want to be sure to sign-up as soon as they have the information available.

PS: Is your OSHA Summary posted?

**REGISTER FOR THESE AND OTHER PROGRAM ON OUR WEBSITE
WE DO CUSTOMIZED TRAINING AT YOUR SITE OR OURS**

NOTE: All of our prior newsletters are archived on our website under the "Contact Us" Tab



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